

<p style="text-align: right;">Page 153</p> <p>1 A. Yes.</p> <p>2 Q. And is this your signature here?</p> <p>3 THE WITNESS: Where is she saying</p> <p>4 "here"?</p> <p>5 MS. SNOW: Yeah, where are you -- oh,</p> <p>6 right there.</p> <p>7 A. Yes.</p> <p>8 Q. (By Ms. Wang) And then would it be fair</p> <p>9 that Brooke Thompson produced a statement that you</p> <p>10 hadn't worked for two days?</p> <p>11 A. That's right. I hadn't worked the previous</p> <p>12 two days.</p> <p>13 Q. I wanted to go back to the symptoms from</p> <p>14 the verbal and physical assault and ask you what</p> <p>15 were the emotional injuries that you received from</p> <p>16 Mr. Reed's attack?</p> <p>17 A. Stress, anxiety, the nightmares.</p> <p>18 Q. Besides stress, anxiety and nightmares, did</p> <p>19 you have any other symptoms from the verbal and</p> <p>20 physical assault from Mr. Reed?</p> <p>21 A. I'm sure I had hives.</p> <p>22 Q. Besides stress, anxiety, nightmares and</p> <p>23 hives, did you have any other symptoms from the</p> <p>24 verbal and physical assaults from Mr. Reed?</p> <p>25 A. Well, the bruising of my arms and my</p>	<p style="text-align: right;">Page 155</p> <p>1 A. They're stress-related.</p> <p>2 Q. So there are other stress reasons why you</p> <p>3 receive hives, correct?</p> <p>4 A. Yes. I wanted to talk a little bit about</p> <p>5 the bruising.</p> <p>6 Q. Did you have any lasting effects from the</p> <p>7 bruising?</p> <p>8 A. No.</p> <p>9 MS. WANG: Thank you so much. Zach,</p> <p>10 did you have any questions? Oh, great.</p> <p>11 MR. BUCHHEIT: Yes, I have some</p> <p>12 questions. But, first, I just wanted to ask you if</p> <p>13 you need a break right now. (Inaudible.)</p> <p>14 THE REPORTER: I'm sorry, I can't hear</p> <p>15 you very well. Is this Mr. Buchheit?</p> <p>16 MR. BUCHHEIT: Yes, ma'am.</p> <p>17 THE REPORTER: Okay.</p> <p>18 MR. BUCHHEIT: I'll just come closer</p> <p>19 to the -- I'll come right here. Let me just test</p> <p>20 this out.</p> <p>21 THE REPORTER: I'm hearing you fine</p> <p>22 now. Yeah.</p> <p>23 MR. BUCHHEIT: Well, I think -- let me</p> <p>24 check. Okay. How is this?</p> <p>25 THE REPORTER: It sounds good.</p>
<p style="text-align: right;">Page 154</p> <p>1 breasts.</p> <p>2 Q. I just want to make sure we have a full</p> <p>3 list. So besides the bruising, stress, anxiety,</p> <p>4 nightmares and hives, did you have any other</p> <p>5 symptoms from the verbal and physical assaults from</p> <p>6 Mr. Reed?</p> <p>7 A. No.</p> <p>8 Q. When you mention hives, how often did you</p> <p>9 have hives in December 2017?</p> <p>10 A. I don't know how often.</p> <p>11 Q. And would you say the hives that you</p> <p>12 received as a result of these alleged physical and</p> <p>13 verbal assaults, did they happen pretty close to</p> <p>14 December 2017, or was it after?</p> <p>15 A. It was both.</p> <p>16 Q. And how late did you receive hives from the</p> <p>17 verbal and physical assaults from Mr. Reed?</p> <p>18 A. What do you mean "how late"?</p> <p>19 Q. Well, in 20 -- in 2021, do you still have</p> <p>20 hives?</p> <p>21 A. If I wake up with a bad nightmare from</p> <p>22 Mr. Reed, yes.</p> <p>23 Q. And before 2017, did you have hives?</p> <p>24 A. I'm sure I have.</p> <p>25 Q. And how often do you get hives?</p>	<p style="text-align: right;">Page 156</p> <p>1 MR. BUCHHEIT: That's better?</p> <p>2 THE REPORTER: Uh-huh.</p> <p>3 MR. BUCHHEIT: I'll try to be loud and</p> <p>4 clear.</p> <p>5 THE REPORTER: Okay.</p> <p>6 EXAMINATION</p> <p>7 BY MR. BUCHHEIT:</p> <p>8 Q. I wanted to just define a few terms just</p> <p>9 because I think I'm going to use them a couple of</p> <p>10 times, just so we're clear and kind of -- we have</p> <p>11 the same understanding of what we mean.</p> <p>12 A. Okay.</p> <p>13 Q. So if I say "communicate," I mean in-person</p> <p>14 conversations, any form of communication over the</p> <p>15 phone or by e-mail or -- or any form of otherwise</p> <p>16 communication. Does that make sense?</p> <p>17 A. Yes.</p> <p>18 Q. And when I say "sexual misconduct," I'd</p> <p>19 like to just use that to refer to both physical and</p> <p>20 verbal allegations of sexual abuse. Is that okay?</p> <p>21 A. (Witness nods head.)</p> <p>22 Q. Okay. And then "allegations," I just mean</p> <p>23 what you said in your lawsuit. Does that make</p> <p>24 sense?</p> <p>25 A. Uh-huh.</p>

<p style="text-align: right;">Page 157</p> <p>1 Q. Okay. So, first, I just want to ask you</p> <p>2 about a few people, if you know them. The first one</p> <p>3 is Vebia Sturm. Do you know that name?</p> <p>4 A. No.</p> <p>5 Q. You've never heard of that name?</p> <p>6 A. No.</p> <p>7 Q. Matt Briesacher?</p> <p>8 A. No.</p> <p>9 Q. Anne Precythe?</p> <p>10 A. I have now.</p> <p>11 Q. Have you ever heard Anne Precythe's name</p> <p>12 before today?</p> <p>13 A. In the lawsuit.</p> <p>14 Q. George Lombardi?</p> <p>15 A. He used to be something with the prison.</p> <p>16 Q. Okay.</p> <p>17 A. I mean, I've heard it before, but I'm not</p> <p>18 sure what he does.</p> <p>19 Q. Well, I represent Anne Precythe, and she's</p> <p>20 the director of the Missouri Department of</p> <p>21 Corrections. Do you have an understanding of what</p> <p>22 the director does?</p> <p>23 A. No.</p> <p>24 Q. So I take it you've never talked to</p> <p>25 Ms. Precythe?</p>	<p style="text-align: right;">Page 159</p> <p>1 Q. Or any communications with Matt Briesacher?</p> <p>2 A. No.</p> <p>3 Q. Or any communications with Anne Precythe?</p> <p>4 A. No.</p> <p>5 Q. Or any communications with anyone in their</p> <p>6 offices?</p> <p>7 A. No.</p> <p>8 Q. Okay. That helps. Are you aware of Anne</p> <p>9 Precythe being involved in any way with these</p> <p>10 allegations -- your allegations in this lawsuit?</p> <p>11 MS. SNOW: I'm going to just object as</p> <p>12 to vague. Obviously, go ahead and answer. But I</p> <p>13 don't even know if you know how to answer that.</p> <p>14 MR. BUCHHEIT: Let me ask a better</p> <p>15 question.</p> <p>16 Q. (By Mr. Buchheit) Do you know about</p> <p>17 investigations into your lawsuit or any of the</p> <p>18 claims of your lawsuit?</p> <p>19 A. Do I know about them? Yes.</p> <p>20 Q. What do you know about those</p> <p>21 investigations?</p> <p>22 A. I know that they're going on, you know. I</p> <p>23 mean...</p> <p>24 Q. Do you know if any of them are concluded?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 158</p> <p>1 A. No.</p> <p>2 Q. Do you know if any of the people we've</p> <p>3 talked about today have ever talked to Anne Precythe</p> <p>4 or communicated with Anne Precythe?</p> <p>5 A. No.</p> <p>6 Q. Or anyone in her office?</p> <p>7 A. Not that I know of, no.</p> <p>8 Q. Or Matt Briesacher? Or Vebia Sturm?</p> <p>9 THE REPORTER: I'm sorry, I'm not</p> <p>10 getting the answers.</p> <p>11 A. No.</p> <p>12 MR. BUCHHEIT: Do you need me to</p> <p>13 repeat any of those questions? I'm asking the court</p> <p>14 reporter.</p> <p>15 THE REPORTER: I got head shakes.</p> <p>16 Q. (By Mr. Buchheit) Can you just confirm</p> <p>17 that your answer was "no" to -- to those questions?</p> <p>18 A. No. That was no to those questions.</p> <p>19 Q. Okay. So -- I'm sorry to repeat myself,</p> <p>20 but just --</p> <p>21 A. That's all right, sir.</p> <p>22 Q. Just to confirm, of all the people we've</p> <p>23 talked about today, are you aware of -- of them</p> <p>24 having any communications with Vebia Sturm?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 160</p> <p>1 Q. Do you -- do you know if Anne Precythe had</p> <p>2 any involvement in those investigations?</p> <p>3 A. I have no idea.</p> <p>4 Q. Or Matt Briesacher?</p> <p>5 A. No.</p> <p>6 Q. Are you aware of any inmates at Chillicothe</p> <p>7 Correctional Center during the time that you were</p> <p>8 there that had conversations with Anne Precythe?</p> <p>9 A. No.</p> <p>10 Q. Or Matt Briesacher?</p> <p>11 A. No.</p> <p>12 Q. Or Vebia Strum?</p> <p>13 A. No.</p> <p>14 Q. Are you aware of any staff at Chillicothe</p> <p>15 Correctional Center while you were there that had</p> <p>16 conversations with Anne Precythe?</p> <p>17 A. No.</p> <p>18 Q. Or Matt Briesacher?</p> <p>19 A. No.</p> <p>20 Q. Or Vebia Strum?</p> <p>21 A. No.</p> <p>22 Q. And just to be clear, are you aware of</p> <p>23 anyone at all that has ever had communications with</p> <p>24 Matt Briesacher?</p> <p>25 A. No.</p>

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<p style="text-align: right;">Page 161</p> <p>1 Q. Or Vebia Strum?</p> <p>2 A. No.</p> <p>3 Q. Or Anne Precythe?</p> <p>4 A. No.</p> <p>5 Q. That will kind of speed things up. We</p> <p>6 talked a little bit earlier about when you reported</p> <p>7 your allegations. Do you remember that?</p> <p>8 A. Yes.</p> <p>9 Q. I don't want to drag you through all of</p> <p>10 that again, but I just wanted to be sure: You're</p> <p>11 also claiming there's retaliation involved?</p> <p>12 A. Yes.</p> <p>13 Q. And did you report the retaliation, too?</p> <p>14 A. No.</p> <p>15 Q. Okay. For any of the defendants?</p> <p>16 A. No.</p> <p>17 Q. Okay. Are you aware of any news reports</p> <p>18 about your allegations?</p> <p>19 A. There was a paper here, the Kansas City</p> <p>20 Star.</p> <p>21 Q. What do you know about that?</p> <p>22 A. I seen it.</p> <p>23 Q. What -- what do you recall about it?</p> <p>24 A. It just said Chillicothe inmate against</p> <p>25 correctional officers.</p>	<p style="text-align: right;">Page 163</p> <p>1 to vague. But you can answer if you understand what</p> <p>2 he's asking.</p> <p>3 Q. (By Mr. Buchheit) Do you understand what</p> <p>4 I'm asking?</p> <p>5 A. Not really.</p> <p>6 Q. Well, I'll just -- your -- your lawsuit</p> <p>7 alleges that the allegations that you're making were</p> <p>8 widespread at Chillicothe. So I'm asking you, would</p> <p>9 you say that the allegations were widespread?</p> <p>10 A. You mean do people in Chillicothe know now?</p> <p>11 Q. Well, I'm asking if your allegations that</p> <p>12 you're making in your lawsuit, if those things</p> <p>13 happened to other people, too, at Chillicothe?</p> <p>14 A. I'm not sure exactly what happened to</p> <p>15 anybody else but myself.</p> <p>16 Q. Okay.</p> <p>17 A. There were people that said things, but I</p> <p>18 can't honestly tell you for sure that it happened to</p> <p>19 them or not.</p> <p>20 Q. You don't remember who those people were?</p> <p>21 A. It just got talked about on the yard and</p> <p>22 whatnot.</p> <p>23 Q. And was that about any particular officer?</p> <p>24 A. More Mosier and -- well, Mustain, Mosier</p> <p>25 and Bearden.</p>
<p style="text-align: right;">Page 162</p> <p>1 Q. Do you recall anything else about that news</p> <p>2 report?</p> <p>3 A. It wasn't my paper so...</p> <p>4 Q. How did you get it?</p> <p>5 A. I was over reading somebody's -- they were</p> <p>6 talking about it and they didn't know it was me.</p> <p>7 Q. Do you know who that person was?</p> <p>8 A. No, I don't remember what her name was.</p> <p>9 Q. Where did that happen?</p> <p>10 A. On the house.</p> <p>11 Q. Which house?</p> <p>12 A. The 3 House.</p> <p>13 Q. At Chillicothe?</p> <p>14 A. No. Here.</p> <p>15 Q. At Vandalia?</p> <p>16 A. Yeah.</p> <p>17 Q. Do you remember when you saw that news</p> <p>18 article?</p> <p>19 A. It's been a while back.</p> <p>20 Q. Do you remember what allegations</p> <p>21 were -- strike that. I don't need to ask you that.</p> <p>22 Would you say that the allegations that you're</p> <p>23 making in your lawsuit were widespread at</p> <p>24 Chillicothe?</p> <p>25 MS. SNOW: I'm going to just object as</p>	<p style="text-align: right;">Page 164</p> <p>1 Q. And Reed, too?</p> <p>2 A. He was later on.</p> <p>3 Q. How often would you say you had those kind</p> <p>4 of conversations?</p> <p>5 A. They'd just talk about it. Early on when</p> <p>6 there was a question of pat-downs, people would say</p> <p>7 Bearden was over-friendly.</p> <p>8 Q. So just in general?</p> <p>9 A. Yes.</p> <p>10 Q. Are you aware of that kind of general</p> <p>11 conversation about the allegations at other</p> <p>12 facilities in Missouri?</p> <p>13 A. No.</p> <p>14 Q. Here at Vandalia?</p> <p>15 A. No.</p> <p>16 Q. How are things here at Vandalia compared to</p> <p>17 Chillicothe?</p> <p>18 A. Well, there's a difference. I mean,</p> <p>19 because you can't go outside here. The food is</p> <p>20 better in Chillicothe. The -- you get more food</p> <p>21 visits there. I was getting private visits there</p> <p>22 with my son. They have patch there. I mean, the</p> <p>23 sporting is better.</p> <p>24 Q. Would you say there's -- you're subject to</p> <p>25 sexual misconduct here at Vandalia?</p>

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<p style="text-align: right;">Page 165</p> <p>1 A. There is -- I mean, I'm sure. I'm sure.</p> <p>2 Q. Well, has it happened to you?</p> <p>3 A. No.</p> <p>4 Q. Do you have the same level of fear of</p> <p>5 sexual misconduct here as you did at Chillicothe?</p> <p>6 A. I don't have the same level of fear, no.</p> <p>7 Q. Are you aware of any DOC policies relating</p> <p>8 to sexual misconduct?</p> <p>9 A. No.</p> <p>10 Q. Are you aware of any policies that mandate</p> <p>11 that the Director of the Department of Corrections</p> <p>12 takes -- takes action related to sexual misconduct?</p> <p>13 A. No.</p> <p>14 Q. Are you aware of any policies in the</p> <p>15 department?</p> <p>16 A. Like what kind of policies?</p> <p>17 Q. Anything to do with --</p> <p>18 A. I don't know what the staff policies are,</p> <p>19 no.</p> <p>20 Q. Okay. Anything to do with staff policies</p> <p>21 as to how staff treat inmates?</p> <p>22 A. I feel they should be fair and just.</p> <p>23 Q. Do you know how long Edward Bearden</p> <p>24 remained at Chillicothe?</p> <p>25 A. He was there -- a few months before I left,</p>	<p style="text-align: right;">Page 167</p> <p>1 Briesacher knows about your allegations?</p> <p>2 A. No.</p> <p>3 Q. Or Vebia Strum?</p> <p>4 A. No.</p> <p>5 Q. Can you think of anyone else outside of the</p> <p>6 people we've talked to today who knows about your</p> <p>7 allegations?</p> <p>8 A. No.</p> <p>9 Q. Can you think of anyone who might have</p> <p>10 reported your allegations to Anne Precythe?</p> <p>11 A. No.</p> <p>12 Q. Or Matt Briesacher?</p> <p>13 A. No.</p> <p>14 Q. Or Vebia Sturm?</p> <p>15 A. No.</p> <p>16 Q. Do you know who John Dunn is?</p> <p>17 A. Yes.</p> <p>18 Q. Who's John Dunn?</p> <p>19 A. He was a psychiatrist from Chillicothe.</p> <p>20 Q. Did you have much interaction with John</p> <p>21 Dunn?</p> <p>22 A. On the walk.</p> <p>23 Q. On the walk?</p> <p>24 A. Yeah.</p> <p>25 Q. What does that mean?</p>
<p style="text-align: right;">Page 166</p> <p>1 he left.</p> <p>2 Q. A few months before you left, he left. Do</p> <p>3 you know about when that was?</p> <p>4 A. No.</p> <p>5 Q. When did you leave Chillicothe?</p> <p>6 A. October of '18.</p> <p>7 Q. Do you know who decided he would remain at</p> <p>8 Chillicothe?</p> <p>9 A. No.</p> <p>10 Q. Would you say -- I'm sorry. Strike that.</p> <p>11 Do you have any reason to believe that Anne Precythe</p> <p>12 knew about your allegations or knows about your</p> <p>13 allegations?</p> <p>14 A. She knows now.</p> <p>15 Q. How?</p> <p>16 A. Probably the newspaper. And she's named in</p> <p>17 the lawsuit.</p> <p>18 Q. Would she know for any other reason that</p> <p>19 you can think of?</p> <p>20 A. No.</p> <p>21 Q. Do you have any reason to believe anyone</p> <p>22 else in her office, the director's office, knows</p> <p>23 about your allegations?</p> <p>24 A. No.</p> <p>25 Q. Do you have any reason to believe Matt</p>	<p style="text-align: right;">Page 168</p> <p>1 A. He would walk on the walk in front of the</p> <p>2 housing units all the time. Or if you go into</p> <p>3 mental health, he would be there.</p> <p>4 Q. Did he ever talk to you?</p> <p>5 A. Briefly he talked to me.</p> <p>6 Q. And what would he talk about with you?</p> <p>7 A. He was weird.</p> <p>8 Q. What do you mean he was "weird"?</p> <p>9 A. Just kind of -- he was just kind of an odd,</p> <p>10 weird guy.</p> <p>11 Q. Did he talk to you the way Mr. Reed or</p> <p>12 Mr. Mosier or Mr. Mustain or Mr. Bearden talked to</p> <p>13 you?</p> <p>14 A. No.</p> <p>15 Q. Did he ever touch you inappropriately?</p> <p>16 A. No.</p> <p>17 Q. Now, your complaint says that Anne Precythe</p> <p>18 was specifically aware of the allegations against</p> <p>19 all the other defendants in this case. Do you think</p> <p>20 that's true?</p> <p>21 MS. SNOW: I'm going to object to the</p> <p>22 extent that it calls for attorney-client privilege.</p> <p>23 But subject to that, you can answer.</p> <p>24 Q. (By Mr. Buchheit) Let me ask you a</p> <p>25 different -- a different way. Do you have any</p>

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<p style="text-align: right;">Page 169</p> <p>1 reason to believe that Anna Precythe was</p> <p>2 specifically aware of your allegations against the</p> <p>3 other defendants in this case?</p> <p>4 A. One more time.</p> <p>5 Q. Oh, I'm sorry. That's okay. Do you have</p> <p>6 any reason to believe that Anna Precythe was</p> <p>7 specifically aware of any of your allegations</p> <p>8 against the other defendants in this lawsuit?</p> <p>9 A. Probably.</p> <p>10 Q. What do you mean "probably"?</p> <p>11 A. Well, it was in the paper so...</p> <p>12 Q. Do you have any reason to believe she would</p> <p>13 be aware for another reason?</p> <p>14 A. If any lawsuits or anything like that would</p> <p>15 be filed, yes.</p> <p>16 Q. Any other reason besides the lawsuit or the</p> <p>17 paper?</p> <p>18 A. No.</p> <p>19 Q. Now, aside from your testimony here today</p> <p>20 and testimony -- you know, your answers to</p> <p>21 interrogatories and your report to Leslie Carsey,</p> <p>22 can you think of any other evidence that would</p> <p>23 support your claims against the defendants in this</p> <p>24 lawsuit?</p> <p>25 A. Just the people.</p>	<p style="text-align: right;">Page 171</p> <p>1 there might be retaliation here.</p> <p>2 Q. Do you feel like you're at risk of harm</p> <p>3 from anyone in the director's office?</p> <p>4 A. No.</p> <p>5 Q. Anyone in the Office of Professional</p> <p>6 Standards?</p> <p>7 MS. SNOW: Do you even know who that</p> <p>8 is?</p> <p>9 A. No. I wouldn't know.</p> <p>10 Q. (By Mr. Buchheit) Okay. Okay. I want to</p> <p>11 talk to you a little bit about cameras at</p> <p>12 Chillicothe.</p> <p>13 A. Okay.</p> <p>14 Q. You're aware there's cameras at</p> <p>15 Chillicothe?</p> <p>16 A. Yes.</p> <p>17 Q. And you can see them?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Are there blind spots?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know what I mean when I say "blind</p> <p>22 spots"?</p> <p>23 A. Yes.</p> <p>24 Q. What's your understanding of that?</p> <p>25 A. Blind spots where they can't be seen.</p>
<p style="text-align: right;">Page 170</p> <p>1 Q. The people who know?</p> <p>2 A. Yeah. People -- just maybe what was going</p> <p>3 on in Chillicothe.</p> <p>4 Q. Are any of those people people that we</p> <p>5 haven't talked about today?</p> <p>6 A. There's numerous names on that lawsuit.</p> <p>7 Q. Can you think of anyone else that we</p> <p>8 haven't talked about today that would know about</p> <p>9 your allegations?</p> <p>10 A. Not right offhand, no.</p> <p>11 Q. I mean, it was in the paper so...</p> <p>12 A. Right.</p> <p>13 Q. Do you know if Anna Precythe has ever</p> <p>14 talked with Edward Bearden or ever communicated with</p> <p>15 Edward Bearden?</p> <p>16 A. I have no idea.</p> <p>17 Q. Do you know if she's ever communicated with</p> <p>18 any of the other defendants in this case?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay. Do you feel like you're still at</p> <p>21 risk of harm?</p> <p>22 A. Yes.</p> <p>23 Q. In what ways?</p> <p>24 A. Well, because Chillicothe comes here, and</p> <p>25 the officers that talk, you know. So I'm afraid</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. Where what?</p> <p>2 A. Where the camera can't see.</p> <p>3 Q. Did any of the allegations of sexual</p> <p>4 misconduct happen in areas where cameras could see</p> <p>5 them?</p> <p>6 A. No. They were at the blind spots.</p> <p>7 Q. And you're sure about that?</p> <p>8 A. Yes, I'm sure.</p> <p>9 Q. And all of your allegations of sexual</p> <p>10 misconduct, did those ever occur in front of other</p> <p>11 staff who were not committing the sexual misconduct?</p> <p>12 A. No.</p> <p>13 Q. Always outside of the view of staff?</p> <p>14 A. Yes.</p> <p>15 Q. Are you -- and -- and you know that for</p> <p>16 certain?</p> <p>17 A. I can't say for certain, no.</p> <p>18 Q. Okay. But as far as you know?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Do you have any reason to believe</p> <p>21 that Anna Precythe has acted maliciously against</p> <p>22 you?</p> <p>23 A. No.</p> <p>24 Q. And you know what I mean when I say</p> <p>25 "maliciously"?</p>

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<p style="text-align: right;">Page 173</p> <p>1 A. Just basically against me.</p> <p>2 MR. BUCHHEIT: Okay. I think that's</p> <p>3 all I have. Do you mind if I just take one quick</p> <p>4 look at my notes?</p> <p>5 THE WITNESS: Go ahead.</p> <p>6 MR. BUCHHEIT: I think that's it,</p> <p>7 though.</p> <p>8 MS. WANG: I have a few follow-up</p> <p>9 questions, Zach, if that would give you more time.</p> <p>10 Either way is fine with me.</p> <p>11 MR. BUCHHEIT: Yeah. If you don't</p> <p>12 mind just waiting, I -- I think I can look through</p> <p>13 my notes real quickly here.</p> <p>14 MS. WANG: No worries.</p> <p>15 MS. SNOW: And just so all of you</p> <p>16 know, I'll -- I'll have some questions as well.</p> <p>17 And, obviously, I'll give you all a chance to ask</p> <p>18 additional questions after I am finished.</p> <p>19 MS. WANG: Sounds good.</p> <p>20 Q. (By Mr. Buchheit) So it's fair to say</p> <p>21 that, as far as you know, Anne Precythe has no</p> <p>22 involvement in the investigations related to your</p> <p>23 case?</p> <p>24 MS. SNOW: I'm going to object. I</p> <p>25 think that misstates her testimony. I'm also going</p>	<p style="text-align: right;">Page 175</p> <p>1 there another spot that's behind closed doors?</p> <p>2 A. I don't think there's -- I don't -- in the</p> <p>3 officers' area or whatever, I don't think there's a</p> <p>4 camera there.</p> <p>5 Q. What do you mean by "officer area"?</p> <p>6 A. In the bubble.</p> <p>7 Q. In the kitchen, is there a desk or table</p> <p>8 that is a blind spot?</p> <p>9 A. I'm not sure what the bubble can see.</p> <p>10 Q. Okay. I was just curious that --</p> <p>11 A. Or the staff.</p> <p>12 Q. Go ahead.</p> <p>13 A. The staff break room, I don't know what the</p> <p>14 camera sees in there either.</p> <p>15 Q. Were you alone with Mr. Reed in the staff</p> <p>16 break room?</p> <p>17 A. I have been before, yes.</p> <p>18 Q. How many times?</p> <p>19 A. I don't know.</p> <p>20 Q. Besides the kitchen, the chemical closet,</p> <p>21 the barbershop and the office staff room, are there</p> <p>22 any other locations that you have been alone with</p> <p>23 Mr. Reed?</p> <p>24 A. No.</p> <p>25 Q. When you mentioned the desk that Mr. Reed</p>
<p style="text-align: right;">Page 174</p> <p>1 to object on the ground of attorney-client</p> <p>2 privilege. Subject to all of that, you can answer.</p> <p>3 MR. BUCHHEIT: Let me try to ask it a</p> <p>4 different way.</p> <p>5 Q. (By Mr. Buchheit) Are you aware of Anne</p> <p>6 Precythe having any involvement in your allegations?</p> <p>7 A. No.</p> <p>8 MR. BUCHHEIT: I don't have anything</p> <p>9 else right now, but I might have some follow-up</p> <p>10 questions after Jen goes.</p> <p>11 MS. SNOW: Christal, do you want to go</p> <p>12 now or just after I go?</p> <p>13 MS. WANG: It doesn't matter. It</p> <p>14 could be either way.</p> <p>15 MS. SNOW: Go ahead.</p> <p>16 MS. WANG: Okay.</p> <p>17 EXAMINATION</p> <p>18 BY MS. WANG:</p> <p>19 Q. Ms. Dean, in your opinion, where are the</p> <p>20 blind spots in the kitchen?</p> <p>21 A. Behind closed doors and where the mops and</p> <p>22 the brooms are. There's several other -- several</p> <p>23 other spots in the kitchen.</p> <p>24 Q. When you said "behind closed doors," are</p> <p>25 you only referencing the chemical closet, or is</p>	<p style="text-align: right;">Page 176</p> <p>1 had referenced to you, where is that desk?</p> <p>2 A. In the staff break room.</p> <p>3 Q. And I just want to clarify because</p> <p>4 Dr. Piasecki mentioned a table. Did Mr. Reed</p> <p>5 verbally assault you in regards to a desk or a</p> <p>6 table, or both?</p> <p>7 A. Both.</p> <p>8 Q. So is it possible that there is a camera in</p> <p>9 the staff break room but you're not sure?</p> <p>10 A. There could be.</p> <p>11 Q. In terms of the table in the kitchen, is</p> <p>12 that a blind spot?</p> <p>13 A. There are several areas of -- there are</p> <p>14 several tables in the kitchen and there are several</p> <p>15 areas that do not -- the cameras don't see.</p> <p>16 Q. How many tables do the cameras not see?</p> <p>17 A. I don't know.</p> <p>18 Q. When Mr. Reed called you in the kitchen so</p> <p>19 he could rub himself inappropriately over your body</p> <p>20 allegedly, did this happen on the table or somewhere</p> <p>21 else?</p> <p>22 A. Can you rephrase -- can you tell me that</p> <p>23 again?</p> <p>24 Q. In your petition, it says, Reed routinely</p> <p>25 called plaintiff into the kitchen solely so he could</p>